

**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH,
Individually and as Parent and Legal
Guardian of W.W., K.W., G.W., and
L.W., minor children, and
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

**PLAINTIFFS' AFFIDAVIT IN SUPPORT OF MOTION
FOR ADMISSION TO APPEAR PRO HAC VICE**

Pursuant to Superior Court Civil Rule 84.2(b) the undersigned requests permission to appear *pro hac vice* and participate in this litigation on behalf of the Plaintiffs. In support of this request, the undersigned counsel affirms the following:

1. I, Keith R. Mitnik, am an attorney with Morgan and Morgan, P.A., 20 N. Orange Avenue, Suite 1600, Orlando, FL 32801, Email: kmitnik@forthepeople.com, telephone number (407) 420-1414.

2. I have been admitted to practice in the following courts:

State Courts:

Florida Supreme Court, Admitted October 19, 1984.

Tennessee Supreme Court, Admitted September 6, 2002.

Kentucky Supreme Court, Admitted April 25, 2014.

U.S. District Courts:

U.S.D.C. for the Middle District of Florida – admitted November 16, 1984

U.S.D.C. for the Southern District of Florida – admitted January 1, 2017

The United States Court of Appeals for the 11th Circuit, Atlanta, GA, --
admitted November 29, 1984

U.S.D.C. for the Western District of Tennessee – admitted April 22, 2008

U.S.D.C. for the District of Kentucky – admitted March 3, 2021.

U.S.D.C. for the Western District of Michigan - admitted March 30, 2023

3. No written disciplinary proceedings have ever been brought against me by any disciplinary authority in any jurisdiction. I have never been publicly sanctioned by any court.

4. I affirm that I will comply with and be bound by the Local Rules of the United States District Court for the District of Wyoming.

5. I acknowledge that local counsel, Taly Goody, is required to be fully prepared to represent the client at any time, in any capacity.

6. I acknowledge and submit to being subject to the disciplinary jurisdiction of the Court for any alleged misconduct arising in the course of preparation and representation in the proceedings.

ACCORDINGLY, Plaintiff respectfully submits this Affidavit in support of the Motion for Admission for Keith R. Mitnik to appear *pro hac vice*.

Date: January 29, 2025

Respectfully Submitted,

/s/ Keith R. Mitnik, Esq.*

Keith R. Mitnik, Esq.

Florida Bar No.: 436127

Kentucky Bar No.: 96001

Tennessee Bar No.: 021836

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**Pro Hac Vice Pending
Counsel for the Plaintiffs*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 29, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Taly Goody
Taly Goody